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13 Attorneys for Defendants
14 UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

18 | WAYMO LLC,

Case No. 3:17-cv-00939-WHA

Plaintiff,

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**DECLARATION OF DAVID ZIFKIN
IN SUPPORT OF DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO, LLC'S OPPOSITION
TO THE URMSON PARTIES' MOTION
TO QUASH AND MODIFY
SUBPOENAS.**

Judge: Hon. William H. Alsup
Trial Date: October 10, 2017

1 I, David Zifkin, declare as follows:

2 1. I am a partner with the law firm of Boies Schiller Flexner LLP representing
3 Defendants Uber Technologies Inc. and Ottomotto LLC (collectively, "Uber") in this matter. I
4 make this declaration in support of Uber's Opposition to the Urmson Parties' Motion to Quash
5 and Modify Subpoenas (Dkt. 1240-8). I make this declaration based on personal knowledge and
6 if called as a witness, I could and would competently testify to the matters set forth herein.

7 2. Attached as **Exhibit 1** is a true and correct copy of an article by Danielle Muoio
8 titled "The former head of Google's self-driving car project has secretly been working on his own
9 startup," published in BUSINESS INSIDER on January 26, 2017.

10 3. Attached as **Exhibit 2** is a true and correct copy of an article by Mark Bergen and
11 Johana Bhuiyan titled "Google's self-driving car unit is losing three key execs," published in
12 RECODE on August 5, 2016.

13 I declare under penalty of perjury that the foregoing is true and correct.

14 Executed this 18th day of August, 2017 at Santa Monica, California.

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17 Dated: August 18, 2017

18 By: /s/ David Zifkin
David Zifkin

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21 **ATTESTATION OF E-FILED SIGNATURE**

22 I, Karen L. Dunn, am the ECF User whose ID and password are being used to file this
23 Declaration. In compliance with General Order 45, X.B., I hereby attest that David Zifkin has
24 concurred in this filing.

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27 /s/ Karen L. Dunn
Karen L. Dunn

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